

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)  ECF Case
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This document relates to:

*Federal Insurance Co., et al. v. Al Qaida, et al.*, Case No. 03-cv-06978  
*Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, Case No. 03-cv-09849  
*Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al.*, Case No. 02-cv-06977  
*Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al.*, Case No. 04-cv-01923  
*Continental Casualty Co., et al. v. Al Qaeda, et al.*, Case No. 04-cv-05970  
*Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al.*, Case No. 04-cv-07065  
*Euro Brokers, Inc., et al. v. Al Baraka, et al.*, Case No. 04-cv-07279

**DECLARATION OF J. SCOTT TARBUTTON TRANSMITTING DOCUMENTS  
IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL DEFENDANTS  
MUSLIM WORLD LEAGUE AND INTERNATIONAL ISLAMIC RELIEF  
ORGANIZATION TO PRODUCE RESPONSIVE DOCUMENTS  
PURSUANT TO FED. R. CIV. P. 37(a)**

I, J. Scott Tarbutton affirm, under penalty of perjury, as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and a member of the law firm Cozen O'Connor. I submit this Declaration to transmit to the Court the following documents submitted in support of Plaintiffs' Reply Memorandum of Law in Support of the Motion to Compel Defendants Muslim World League and International Islamic Relief Organization to Produce Responsive Documents Pursuant to Federal Rule of Civil Procedure 37(a).

2. Attached hereto as Exhibit 1 is a true and correct copy of a June 18, 2004 U.S. Department of State Diplomatic Cable, *Terrorist Finance: [REDACTED]*.

3. Attached hereto as Exhibit 2 is a true and correct copy of a February 13, 2007 U.S. Department of State Diplomatic Cable, *Terrorist Finance: Post-Vetting of Human Appeal International (HAI)*.

4. Attached hereto as Exhibit 3 is a true and correct copy of plaintiffs' chart, *Communications with Saudi Arabia's Embassies in Pakistan and Afghanistan*, attaching true and correct copies of discovery documents ASH000276-277, IIRO0014955-14957, IIRO179846-179849, ASH000902, IIRO96108, IIRO96075-76, IIRO96114, MWLIIRO0010995, ASH0149637, ASH000925-000930, Naseef (005), IIRO001433-1434, ASH033532, Jelaidan (022), KADI028380, KADI28397-99, KADI28412, FED-PEC0203689-699, IIRO0026468-26490, FED-PEC0173851-54, and ASH038657-38667.

5. Attached hereto as Exhibit 4 is a true and correct copy of plaintiffs' chart, *MWL and IIRO Audits and Underlying Financial Records*.

6. Attached hereto as Exhibit 5 is a true and correct copy of plaintiffs' chart, *66 Bank Accounts in Pakistan*, attaching true and correct copies of discovery documents IIRO025784, IIRO025785, IIRO093327, IIRO130888-130890, and IIRO0265511-265512.

7. Attached hereto as Exhibit 6 is a true and correct copy of plaintiffs' chart, *Rabita Trust*, attaching true and correct copies of discovery documents Jelaidan (020), MWL008691, IIRO149661, IIRO149642-149644, MWL030890-30892, Jelaidan (017), MWL030817-30819, Jelaidan (022), Jelaidan (007), Jelaidan (008), and Jelaidan (021).

8. Attached hereto as Exhibit 7 is a true and correct copy of plaintiffs' chart, *Al Haramain Al Masjed Al Aqsa*, attaching true and correct copies of discovery documents IIRO017895-17896, MWL019138, IIRO017415, and IIRO017597.

9. Attached hereto as Exhibit 8 is a true and correct copy of plaintiffs' chart, *Third World Relief Agency, El Fatih Hassanein, and Sukarno Hassanein*, attaching true and correct copies of discovery documents IIRO339030-339032.

10. Attached hereto as Exhibit 9 is a true and correct copy of an excerpt from the September 5, 1995 Interview of Sukarno Ali Hassanein by the Ministry of Internal Affairs of the Republic of Austria Counterterrorism Office.

Executed in Philadelphia, Pennsylvania on January 26, 2018.

/s/\_\_\_\_\_  
J. Scott Tarbutton, Esq.

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